

1 Bruce Berline, Esq.
2 Law Office of Bruce Berline LLC
3 Security Title Building, Second Floor
4 Isa Drive, Capitol Hill
5 P. O. Box 5682 CHRB
6 Garapan, Saipan, MP 96950
7 Tel: (670) 233-3663
8 Email: bberline@gmail.com

9
10 Aaron Halegua
11 AARON HALEGUA, PLLC
12 524 Broadway, 11th Floor
13 New York, New York 10012
14 Tel: (646) 854-9061
15 Email: ah@aaronhalegua.com

16
17 *Attorneys for Defendant Arnold Palacios in his Personal Capacity*

18
19
20
21
**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN MARIANA ISLANDS**

22 Imperial Pacific International (CNMI) LLC,

23 Plaintiff,

24 v.

Commonwealth of the Northern Mariana
Islands, *et al.*,

Defendants.

Case No. 24-cv-00001

**STIPULATION TO AMEND BRIEFING
SCHEDULE FOR DEFENDANTS'
MOTIONS TO DISMISS AND
PLAINTIFF'S MOTION TO AMEND**

Hearing date: n/a

Hearing time: n/a

Judge: Hon. David O. Carter

22
23
24 Defendant Governor Arnold Palacios (“Governor Palacios”), in both his official and personal
capacities, Defendant the Commonwealth of the Northern Maria Islands (together, “Defendants”) and
Plaintiff Imperial Pacific International (CNMI) LLC (together with Defendants, the “Parties”), by and
through their counsel of record, hereby stipulate and agree:

1. Defendants filed their Motions to Dismiss Plaintiff's Second Amended Complaint on
2 August 13, 2024. (ECF Nos. 59, 60, 61 (together, the "MTD's")).
2

3. On August 27, 2024, Plaintiff filed its opposition to the MTD's (ECF Nos. 63, 64),
4 which would make Defendants' reply briefs due on September 3, 2024.
4

5. On August 27, 2024, Plaintiff also filed a motion seeking leave to file a Third Amended
6 Complaint (ECF No. 65), which would make Defendants' opposition briefs due on September 10,
7 2024 and Plaintiff's reply brief due on September 17, 2024.
7

8. Given the relationship between the MTD's and Plaintiff's motion seeking leave to
9 amend, Defendants would like to file their reply briefs to the MTD and oppositions to Plaintiff's
10 motion for leave to amend simultaneously. This will also be more streamlined and efficient.
11

12. Accordingly, the Parties hereby request that the Court extend Defendants' deadline to
13 file their replies to the MTD's to September 10, 2024—the same date that their oppositions to
14 Plaintiff's motion for leave to amend is due.
14

15. In addition, in the event that a Defendant files a single brief as both the reply to the
16 MTD and opposition to Plaintiff's motion for leave to amend, the Parties request that the page limit
17 for that brief be 25 pages—the regular page limit for an opposition brief.
18

19 Dated: August 30, 2024
20

21 _____/s/
22 Michael Chen
23 Attorney for Plaintiff Imperial Pacific International (CNMI), LLC
24

1 _____
1 /s/_____

2 Aaron Halegua
2 Bruce Berline
2 *Attorneys for Defendant Arnold Palacios, in his personal capacity*

3 _____
4 /s/_____

5 Brendan Layde
5 *Attorney for Defendant Arnold Palacios, in his official capacity*

6 _____
7 /s/_____

8 J. Robert Glass, Jr.
8 *Attorney for the Defendant the Commonwealth of the Northern Mariana Islands*

9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24